

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

100-1015 P.3:18
CA NO. 04-10028-DPW

THOMAS COLLURA,
Plaintiff,

v.

MILTON VEGA, NEIL
MURPHY, and Certain Unnamed
Individuals,
Defendants.

JOINT STATEMENT

Pursuant to the Court's Notice of Scheduling Conference and Rule 16.1(D) of the Local Rules of the United States District Court for the District of Massachusetts, counsel for the above named parties have conferred and state as follows:

1. Joint Discovery Plan and Motion Schedule:

The parties propose the following pre-trial schedule:

- (a) Automatic document disclosure to be completed on or before May 11, 2004.
- (b) Written discovery requests are to be filed by November 15, 2004, and answers/responses are to be filed within the time provided by the rules;
- (c) All depositions are to be completed by January 15, 2005, except for expert witness;
- (d) The plaintiffs' expert witnesses shall be designated by February 15, 2005, and defendants' expert witnesses shall be designated within the time allowed by the Local Rules after plaintiff discloses said expert(s) as contemplated by Fed. R. Civ. P. 26(b)(4)(A); designation of experts shall include provision of any information required by the Federal Rules of Civil Procedure and/or the Local Rules of the District of Massachusetts; any expert depositions shall be completed within the time allowed by the Local Rules of defendants' expert designation;

- (e) All dispositive motions are to be filed by April 30, 2005, and responses are to be filed thereafter pursuant to Local Rule 7.1;
 - (f) The plaintiff shall name other parties, if any, not later than June 30, 2004;
 - (g) A final pre-trial conference will be held per order of the Court.
2. Defendants intend to take approximately 2 depositions during the discovery period. Plaintiff intends to take approximately 5 depositions during discovery period, depending upon written discovery responses.
3. Certifications regarding each parties' consultation with counsel regarding budgets and alternative dispute resolution will be filed separately.

Plaintiff, Thomas Collura,
by his attorney,



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Defendants,
By their Attorney,



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